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ORIGINAL FILE

December 14, 1992

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

By Hand Delivery
Ms. Donna R. Searcy
Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

Re: CC Docket No. 92-77
In the Matter of Billed Preference for 0+ InterLATA Calls

Dear Ms. Searcy:

Transmitted herewith for filing on behalf of LDDS Communications, Inc. are an original and five copies of its supplemental comments on the Commission's proposal to establish a system of compensation for the transfer of 0+ calling card calls. If there are any questions, please communicate directly with the undersigned.

Sincerely,

Mitchell F. Brecher
Counsel for LDDS Communications, Inc.

Enclosure

cc: All parties of record

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ORIGINAL FILE

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of Billed Party Preference for 0+ InterLATA Calls	CC Docket No. 92-77 Phase I

SUPPLEMENTAL COMMENTS OF
LDDS COMMUNICATIONS, INC.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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December 14, 1992

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SUMMARY

LDDS Communications, Inc. supports the Commission's proposal to require interexchange carriers issuing calling cards in a proprietary format (e.g., the CIID format) and allowing callers to use those cards on a 0+ basis to compensate other carriers for the costs of handling misdirected calls and transferring callers to the card-issuing carrier.

The need for such a compensation system would not have been necessary if the Commission had adopted its 0+ Public Domain proposal. Adoption of 0+ Public Domain would have obviated the problem of thousands of CIID calls reaching the networks of other carriers necessitating that those carriers handle those calls and arrange for the callers to be able to reach AT&T.

There are several methods for transferring 0+ calls. These include call splashing, reorigination to the originating local exchange carrier and transfer by dialing instruction. No matter which call transfer method is used, three circumstances will exist. First, the presubscribed IXC will incur costs in transferring the call. Second, the presubscribed IXC will provide a service to the card-issuing IXC. Third, the card-issuing IXC will be receiving an economic benefit. The existence of these factors entitles the transferor IXC to cost-based compensation from the card-issuing IXC.

LDDS transfers CIID card calls to AT&T by means of dialing instruction. It has found that method to be the most efficient and consumer friendly means for callers to reach AT&T when placing a CIID card call on a 0+ basis from phones presubscribed to LDDS or its affiliates. It always works and does not depend upon the capabilities of the originating telephone equipment or of the networks of any local exchange carrier or IXC.

Irrespective which transfer method is used by a carrier, LDDS believes that the transferor IXC is entitled to compensation sufficient to make it whole, i.e., that it cover all of

the carrier's out of pocket expenses. The actual costs incurred will depend, in part, on the transfer method used. Using the dialing instruction method, LDDS's costs include access charges, interexchange transmission and switching costs, operator costs (labor and equipment) and screening or LIDB validation costs.

0+ proprietary call transfer service is a communications common carrier service. As such, it should be offered pursuant to tariff. Although the Communications Act does allow carriers to provide services to each other pursuant to intercarrier agreements, such agreements would not be appropriate for 0+ proprietary calling card call transfer service. Intercarrier agreements depend upon the willingness of the carriers to negotiate such agreements. Given AT&T's previous unwillingness to negotiate with its competitors, it is uncertain that such agreements could be negotiated between AT&T and those other IXCs which receive millions of 0+ CIID card calls. Each IXC providing 0+ call transfer service should be allowed to file with the Commission a tariff to recover the costs incurred by it in providing the transfer service.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of Billed Party Preference for 0+ InterLATA Calls	)	CC Docket No. 92-77

COMMENTS OF LDDS COMMUNICATIONS, INC.
ON 0+ PROPRIETARY CALLING CARD
TRANSFER PROPOSAL

LDDS Communications, Inc. by its attorneys, hereby submits its comments on the Commission's proposal to require payment of compensation by interexchange carriers ("IXCs") which have issued calling cards in the proprietary Card Issuer Identifier ("CIID") format. Under that proposal, IXCs which issue proprietary calling cards and allow those cards to be used to originate calls on a 0+ dialing basis from telephones presubscribed to other IXCs would compensate those presubscribed IXCs for the costs incurred in receiving those 0+ calls and transferring them to the card-issuing IXC. The details of the Commission's compensation proposal are set forth in the Report and Order and Request for Supplemental Comment issued in this proceeding.[1] LDDS supports the Commission's proposal to require such compensation and urges the Commission to require the prompt implementation of a system of compensation.

I. INTRODUCTION

In December 1991, the Competitive Telecommunications Association and nineteen of its member companies filed with the Commission an emergency motion. That motion asked the Commission to address the public interest and competitive concerns which had arisen as a direct and proximate result of the mass distribution by the American Telephone and Telegraph Company

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1 Billed Party Preference for 0+ InterLATA Calls (Report and Order and Request for Supplemental Comments), FCC 92-465, released November 6, 1992, at ¶ 64 (hereinafter, "Report and Order").

("AT&T") of many millions of calling cards in the CIID format. As noted by those petitioners, the distribution of approximately thirty million CIID cards by AT&T, combined with AT&T's confusing and misleading instructions to recipients of those cards to "destroy" their old line-based or Regional Accounting Office code-based cards, and combined with instructions directing those cardholders to place their CIID card calls on a 0+ basis from all telephones, including those phones presubscribed to other carriers, has resulted in millions of unbillable, unverifiable and uncompletable calls reaching those competitors' networks and has reduced substantially the amount of completable and commissionable calls that could be made from any public telephone not presubscribed to AT&T.[2]

To remedy some of the consumer inconvenience and competitive inequities that had resulted from AT&T's CIID card distribution and marketing practices, the Commission, in this proceeding, proposed and sought comment on a "0+ Public Domain" proposal.[3] Specifically, the Commission proposed that issuers of proprietary calling cards be required to limit use of those cards to calls placed by dialing carrier-specific access codes (e.g., 950 or 1-800 codes). Issuers of "0+" calling cards would be required to allow all other carriers to validate and accept those cards. LDDS and its affiliates[4] supported the Commission's 0+ Public Domain proposal. Unfortunately, the Commission declined to adopt that proposal. In the Report and Order, the Commission instead directed AT&T to implement a system of "aggressive education."[5] Implicit in this customer education requirement is the largely speculative notion that, by instructing consumers to read public

2 Recently, the Commission admonished AT&T for its confusing and misleading CIID card marketing and distribution practices. See letter to Mr. Robert E, Allen, Chairman and Chief Executive Officer, American Telephone and Telegraph Company, from Donna R. Searcy, Secretary, Federal Communications Commission, FCC 92-490, released November 16, 1992.

3 Billed Party Preference for 0+ InterLATA Calls, (Notice of Proposed Rulemaking), FCC 92-169, released May 8, 1992, at ¶¶ 36-43.

4 On December 4, 1992, LDDS and Advanced Telecommunications Corporation ("ATC") merged. ATC is now a wholly-owned subsidiary of LDDS. ATC is also the corporate parent of AmeriCall, Inc. and First Phone of New England. AmeriCall and First Phone are both IXCs which are extensively involved in the provision of operator-assisted services. These companies have been active participants in this and other Commission proceedings affecting the 0+ services market.

5 Report and Order, supra, at ¶ 57.

telephone signage, providing "clear and accurate" dialing instructions on every proprietary calling card issued, and by instructing cardholders about the availability of AT&T's 1-800 access number (one of the best kept secrets in telecommunications), the incidence of CIID card calls reaching other carriers' networks might somehow be reduced.

LDDS continues to believe that 0+ Public Domain remains the most appropriate solution to AT&T's exploitation of its market power in the calling card and 0+ calling markets. Given the Commission's refusal to date to embrace that policy, its compensation proposal, if implemented soon and if implemented correctly, will at least afford some measure of compensation for the out-of-pocket costs incurred by carriers in the receipt and handling of 0+ CIID card calls, millions of which will continue to reach their networks.

II. COST-BASED COMPENSATION SHOULD BE REQUIRED FOR ALL METHODS OF CALL TRANSFER, INCLUDING LDDS'S PREFERRED TRANSFER METHOD -- REORIGINATION BY DIALING INSTRUCTION

Whenever a caller using an AT&T CIID card attempts to place a 0+ call from a telephone presubscribed to LDDS or one of its subsidiaries (e.g., AmeriCall or First Phone), LDDS incurs significant costs notwithstanding the fact that the inability to accept the CIID card precludes it from being able to complete those calls and to derive revenues therefrom. These costs include access charges, interexchange transmission and switching costs, operator costs (both labor and equipment) and, in some cases, line information database ("LIDB") validation charges. Irrespective of costs, important business considerations compel LDDS to arrange for transfer of 0+ CIID card calls to the card-issuing carrier and to effectuate those transfers in the most efficient and convenient manner, both for itself and for callers. LDDS's primary objective is to enable AT&T cardholders to utilize their preferred carrier in a manner that is economically efficient. Although 0+ service from presubscribed public phones is an important part of the business of LDDS, it is not its primary business. The company is primarily involved in the direct dial portion of the long distance market and is a major provider of 1+ services to business and residential users. Because it places a high value on its corporate reputation and on the perception of its service quality in the and, indeed, cannot afford, to be perceived as creating complexities and inconveniences for consumers in reaching their calling card-issuing IXCs.

Based upon its experience as a telecommunications service provider and upon its familiarity with existing technology both within local exchange and interexchange telecommunications networks and of public and private telecommunications equipment, LDDS has concluded that transfer of 0+ CIID card calls to AT&T by means of simple and clear dialing instructions (e.g., "Please hang up and dial 1-800-225-5288") is by far the most reliable, efficient and consumer friendly mechanism for transferring CIID card calls to AT&T. Call transfer by means of dialing instructions is the only ubiquitously-available means for transferring 0+ CIID card calls from the presubscribed IXC to the card-issuing IXC. That method works from all phones in all locations. It enables the card-issuing carrier to complete the call from the originating location and to bill the call from the originating locations in all circumstances.

The other means for call transfer do not produce such satisfactory results. Call transfer to AT&T at a location close to LDDS's switching centers almost always will result in the calls being billed from the transferred location rather than from the originating location. Although LDDS would be willing to transmit to AT&T the originating telephone number information (Automatic Number Identification or "ANI") for the transferred calls on a real time basis, AT&T is either unwilling or unable to accept that information. If calls are billed from the transfer location without the caller's informed consent, it is considered to be "call splashing" and is violative of Section 226(b)(1)(H) of the Communications Act[6]. Call transfer by means of reorigination to the originating local exchange carrier is another incomplete solution. It simply cannot be achieved from most LEC-provided public phones. Where such call reorigination can be accomplished, it necessitates the inefficient backhauling of calls from the presubscribed carrier's operator center to the network facilities of the LEC originating the call. Neither of these transfer methods are satisfactory either to LDDS or to its customers. Based upon extensive experience with consumers

6 47 U.S.C. § 226(b)(1)(H) (1991).

in the months following AT&T's distribution of many millions of proprietary calling cards usable on a 0+ basis, LDDS has concluded that dialing instruction transfer is the most appropriate call transfer method for it and for consumers.[7] As such, it plans to continue to transfer 0+ CIID card calls to the card-issuing IXC in that manner and believes that it should be allowed to recover from the card-issuing IXC all costs reasonably incurred by it in effectuating those transfers.

Whatever transfer method is utilized by an IXC, three critical circumstances will exist. First, the presubscribed IXC will have incurred costs in receiving and transferring the call. Second, the presubscribed IXC will have provided a communication service for the transferee IXC. Third, the card-issuing transferee IXC will have received an economic benefit. Since each of those factors will be present regardless which means is used for the transfer of 0+ CIID card calls, the public interest compels that the recipient of the benefits of call transfer -- the card-issuing IXC, provide cost-based compensation to the provider of that service -- the presubscribed IXC which bears the costs of the transfer. In this regard, it should be noted that the card-issuing IXC not only is receiving the economic benefit of 0+ CIID card call transfers, but it is that IXC's conduct and business policies which have caused LDDS and other presubscribed IXCs to have incurred the costs of such call transfers. Specifically, those costs could have been avoided if AT&T had not voluntarily distributed millions of proprietary calling cards with misleading dialing instructions and if it had not implemented discriminatory policies regarding the validation of those cards.

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7 LDDS recognizes that other IXCs may elect to use other transfer methods and receive compensation for transfers using those methods. LDDS takes no position on how other carriers may choose to transfer 0+CIID card calls.

III. 0+ CALL TRANSFER COMPENSATION SHOULD BE SET AT LEVELS SUFFICIENT TO RECOVER ALL COSTS OF THE TRANSFERRING IXC IN HANDLING 0+ CIID CARD CALLS AND TRANSFERRING THOSE CALLS TO AT&T

As explained above, LDDS utilizes the dialing instruction method for transferring calls to AT&T. Whether carriers prefer dialing instruction transfer or other means, they should be entitled to recover from AT&T all costs reasonably incurred by them in handling those calls and in arranging for the calls to be transferred to AT&T. The underlying purpose of any 0+ call transfer plan should be to make the transferring carrier whole. Stated simply, LDDS and other IXCs should not suffer any unrecoverable out-of-pocket losses as a result of their receipt of 0+ CIID card calls. LDDS does not want calls to reach its network that it has no opportunity to complete. The Commission has the opportunity to prevent AT&T from imposing out-of-pocket losses on LDDS and other IXCs by allowing those IXCs to recover their costs occasioned by the routing to their network of calls they do not want to receive but are unable to prevent.

To ensure that these carriers are made whole, they should be permitted to set 0+ transfer charges sufficient to enable them to recover all costs incurred by them in the receipt and transfer of those calls. For a carrier like LDDS utilizing the dialing instruction transfer method, recoverable cost components would include the following: (i) access charges based upon the LECs' applicable access tariffs; (ii) its own interexchange transmission costs (to recover the cost of routing the call from its point of presence near the originating location to the LDDS operator position); (iii) validation charges for card numbers not rejected through six digit screening; and (iv) operator costs, including labor costs based upon salaries and benefits for its operators, as well as costs of the operator station equipment used in the handling and transferring of those calls. Since these are the actual cost items incurred by LDDS every time that a 0+ CIID card call reaches its network, it should be entitled to receive compensation sufficient to recover each of these costs in order to make it whole.

IV. 0+ CALL TRANSFER SERVICE SHOULD BE OFFERED PURSUANT TO TARIFF

In the Report and Order, the Commission asks for comment on whether 0+ call transfer service should be provided pursuant to tariff, carrier-to-carrier contract, or by some other compensation mechanism.[8] As set forth above, 0+ call transfer service is a communication service no matter how that service is provided. Section 203 of the Communications Act[9] requires that every common carrier shall offer services pursuant to tariffs filed with the Commission. LDDS recognizes that several sections of the Act contemplate that services between carriers may be offered pursuant to carrier-to-carrier agreements rather than tariffs.[10] While LDDS does not dispute that the Act allows such agreements and that the Commission has authority under the Act to permit regulated carriers to govern their relationships and the provision of services between them in accordance with contracts, it does not believe that contracts would be an appropriate means for 0+ call transfer compensation.

Intercarrier agreements are appropriate when carriers have chosen to do business with each other and have demonstrated their willingness to negotiate such agreements in good faith. At this time, AT&T is the only IXC that has issued calling cards in the CIID format, claimed those cards to be "proprietary" and enabled them to be used on a 0+ dialing basis. Thus, LDDS and other IXCs have been receiving 0+ CIID card calls and those carriers will be looking to AT&T for 0+ call transfer compensation. Based upon AT&T's previous position in dealing with competitors, it is unclear whether AT&T will negotiate call transfer compensation agreements with its competitors.

This is not the first time that issues regarding such cooperative agreements have been raised. For example, in November 1990, in response to an order of the United States District Court in the AT&T divestiture proceeding,[11] each of the Bell Operating Companies ("BOCs") filed

8 Report and Order, supra, at ¶ 64.
9 47 U.S.C. § 203 (1991).
10 See, e.g., Sections 211 and 219 (47 U.S.C. § § 211 and 219 (1991).
11 United States v. Western Electric Co., Inc., et al, 698 F. Supp. 348, 367-368 (D.D.C. 1988).

with the Department of Justice plans for equal access for 1+ coin sent-paid calling from public telephones. Several of the BOCs' coin sent-paid equal access plans would have required IXCs like LDDS and others either to carry 1+ coin sent-paid calls from BOC phones themselves or to enter into subcontractor arrangements with another IXC in order to participate in public phone presubscription for 0+ traffic. In response to those plans, AT&T -- the only IXC then (or now) able to handle sent-paid traffic from BOC public phones -- informed the Department of Justice that it was not willing to enter into such cooperative arrangements with any of its competitors. In this regard, AT&T stated as follows:

> AT&T is not interested in entering into such subcontractor relationships with its competitors and thus is not prepared to negotiate these matters.[12]

Just as AT&T was not willing to negotiate with its competitors two years ago with respect to coin sent-paid calling, LDDS has no basis for presuming that AT&T will be willing to negotiate call transfer compensation agreements now. In light of this previous refusal to negotiate with its competitors, LDDS has concluded that 0+ call transfer tariffs will be necessary in order to ensure the right of IXCs to recover their costs of such call transfers and to be made whole.

V. ADDITIONAL QUESTIONS RAISED IN THE REPORT AND ORDER

As indicated above, LDDS has advocated that 0+ call transfer services should be provided by IXCs pursuant to tariffs filed with the Commission in order to enable those carriers to implement cost-based charges for their transfer service. As a proponent of tariffs, LDDS hereby responds to several specific questions which the Commission has addressed to those who believe that these services should be offered on a tariff basis.

12 Letter to Constance K. Robinson, Esq., Chief, Communications and Finance Section, Antitrust Division, U.S. Department of Justice, from Marc C. Rosenblum, General Attorney, dated December 17, 1990.

1. **What is the definition of the service to be provided?**

The service to be provided is a 0+ proprietary calling card transfer service. The service is provided whenever a call is dialed on a 0+ basis from a telephone presubscribed to a carrier other than the card-issuing IXC, the caller attempts to have the call charged to a calling card issued by another IXC, and the card-issuing IXC denies the presubscribed IXC the ability to accept the card. The transfer occurs whenever the presubscribed carrier takes any action to enable the caller to utilize the service of the card-issuing IXC. Such action may include dialing instructions, physically routing the call to the card-issuing IXC, or reoriginating the call back to the originating LEC for delivery to the card-issuing IXC.

2. **When would the transfer charges be assessed?**

0+ transfer charges would be assessed when the 0+ transfer service is provided, i.e., when a 0+ call reaches the presubscribed carrier's network and that IXC takes any action, including providing the caller with dialing instructions, which enables the caller to reach the card-issuing carrier.

3. **Should OSPs be required to confirm that the call was received by the IXC before the transfer charge is assessed?**

It is the responsibility of the transferring IXC to provide the transfer service. It is the responsibility of the transferee IXC as the recipient of the service to confirm that it was provided. That is the case for all other communication services. Of course, with the dialing instruction transfer method used by LDDS, the only matter to be confirmed is that the caller has received the proper dialing instructions. Naturally, LDDS would be willing to confirm the number of transfers provided by maintaining standard call records for each CIID card call attempt. Once the caller has been instructed how to reach the card-issuing IXC, the service has been completed. Whether or not the caller chooses to act in accordance with those instructions, the transfer service has been provided and the transferring IXC is entitled to compensation. LDDS incurs costs when the 0+

CIID card calls reach its network. It should be entitled to transfer compensation as soon as it performs the transfer service. Whether the caller acts on those instructions and attempts to call using the card-issuing carrier's services is not LDDS's responsibility.

4. How will IXCs subscribe to the service?

As with most communication services, IXCs will subscribe to 0+ transfer service by using it, i.e., by causing 0+ CIID card calls to reach other carriers' networks necessitating that those other carriers incur the costs of handling those calls and of transferring the calls to the card-issuing carriers. If an IXC does not want to use the service, it can prevent 0+ calls from reaching other IXCs' networks by limiting use of proprietary calling cards to carrier-specific dialing patterns. By allowing such cards to be used on a 0+ basis from phones presubscribed to other IXCs, issuers of CIID cards are causing those other carriers to incur the costs of transfer and, by doing so, are subscribing to the 0+ transfer service.

5. What cost elements would be recovered through the tariffed rate?

In order to make the carrier providing the transfer service whole, recoverable cost elements in 0+ transfer tariffs must include all costs of the transferring IXC incurred in providing the service. For a carrier like LDDS using the dialing instruction method of call transfer, those cost elements would include access charges, interexchange transmission and switching costs, validation and screening fees, and operator expenses

6. What type of cost support are the OSPs seeking to provide such service prepared to include in their proposed tariffs?

IXCs offering 0+ call transfer service should provide cost support information for every cost element they seek to recover in their call transfer tariffs. All of the costs incurred by LDDS in providing its call transfer service are allocable on either a per call or per minute basis.

CONCLUSION

As set forth in these comments, LDDS urges the Commission to adopt forthwith a plan to ensure that IXCs receive cost-based compensation for the costs of transferring calls which reach their networks as a result of 0+ dialing by holders of proprietary calling cards. Accordingly, LDDS respectfully urges the Commission to implement a system of 0+ call transfer compensation in accordance with the views expressed in these comments.

Respectfully submitted,

LDDS COMMUNICATIONS, INC.

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December 14, 1992

CERTIFICATE OF SERVICE

I, Raina N. Price-Webster, do hereby certify that a copy of the attached Supplemental Comments for LDDS Communications, Inc., which was filed with the Federal Communications Corporation on December 14, 1992, has been served via first-class mail, postage pre-paid to the recipients on the attached pages.

Raina N. Price-Webster

Raina N. Price-Webster

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